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18 Attorneys for Plaintiffs  
19 DEMETRIC DI-AZ and OWEN DIAZ

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

100 DEMETRIC DI-AZ, OWEN DIAZ, and  
101 LAMAR PATTERSON,

102 Plaintiffs,

103 v.

104 TESLA, INC. dba TESLA MOTORS, INC.;  
105 CITISTAFF SOLUTIONS, INC.; WEST  
106 VALLEY STAFFING GROUP;  
107 CHARTWELL STAFFING SERVICES, INC.;  
108 and DOES 1-50, inclusive,

109 Defendants.

110 Case No. 3:17-cv-06748-WHO

111 **DECLARATION OF SABRINA GRISLIS**  
112 **IN SUPPORT OF PLAINTIFFS' REPLY**  
113 **IN SUPPORT OF THEIR MOTION FOR**  
114 **SANCTIONS**

115 Date: February 19, 2020  
116 Time: 2:00 p.m.  
117 Courtroom: 2, 17th Floor  
118 Judge: Hon. William H. Orrick

119 Trial Date: May 11, 2020  
120 Complaint filed: October 16, 2017

1 I, SABRINA GRISLIS, hereby declare:

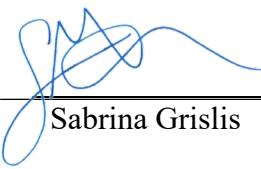
2 1. I am a paralegal with the law firm of California Civil Rights Law Group,  
3 attorneys of record for Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this  
4 Declaration in support of Plaintiffs' Motion for Sanctions. I have personal knowledge of the  
5 facts stated herein and if called upon to testify, I could and would competently testify thereto,  
6 except as to those matters that are stated upon information and belief.

7 2. Attached hereto and marked as **Exhibit 1** is a true and correct copy of the Proof of  
8 Service that I received from our process server for service of a deposition subpoena on Ramon  
9 Martinez dated October 2, 2019 at 6:55 pm.

10 3. On or around October 2, 2019, I received a phone call from someone identifying  
11 themselves as Ramon Martinez. He said he just received a deposition subpoena for a Ramon  
12 Martinez, but he was the wrong person. He told me that he has never worked for Tesla, Inc. and  
13 that there are several people with the name Ramon Martinez in his neighborhood.

14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct. Executed on January 10, 2020 in San Anselmo, California.

16 DATED: February 3, 2020

17 By: 

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19 Sabrina Grislis